

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS,
FORT WORTH DIVISION

CHERYL HURD, M.D., §
§
Plaintiff, §
§
v. § CIVIL ACTION NO. 4:22-cv-00388
§
TARRANT COUNTY HOSPITAL §
DISTRICT d/b/a JPS HEALTH §
NETWORK AND JOHN PETER §
SMITH HOSPITAL, et al., §
§
Defendants. §

**PLAINTIFF'S RESPONSE TO DEFENDANTS'
MOTION TO EXCLUDE TESTIMONY OF PLAINTIFF'S
EXPERTS ADAM PORTACCI AND BRANDI KLEINMAN**

TO THE HONORABLE REED O'CONNOR, UNITED STATES DISTRICT JUDGE:

COMES NOW CHERYL HURD, Plaintiff in the above cause, and files this, her *Response to Defendants' Motion to Exclude Testimony of Plaintiff's Experts Adam Portacci and Brandi Kleinman and Brief in Support* (the "Response").

As set out in the accompanying Brief filed in support of this Response, this Court should deny the *Defendants' Motion to Exclude Testimony of Plaintiff's Experts Adam Portacci and Brandi Kleinman and Brief in Support* (ECF No. 49) in all respects. The legal and factual basis for the requested relief is fully set out in that separate accompanying briefing, which Plaintiff herein incorporates by reference, as well as Plaintiff's Appendix.

CONCLUSION

Plaintiff respectfully requests that the Court deny the *Defendants' Motion to Exclude Testimony of Plaintiff's Experts Adam Portacci and Brandi Kleinman and Brief in Support* in all respects and for all other relief to which she may be entitled.

Respectfully submitted,

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By: /s/ Christopher S. Ayres
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing pleading was forwarded to all registered counsel via the Court's electronic service system on the date and time of its submission.

/s/ Christopher S. Ayres
Christopher S. Ayres